



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

DMP:AAS
F. #2015R01787

*271 Cadman Plaza East
Brooklyn, New York 11201*

December 17, 2017

By ECF

Robert J. Cleary, Esq.
Dietrich L. Snell, Esq.
Brittany N. Benavidez, Esq.
Proskauer Rose LLP
Eleven Times Square
New York, NY 10036

Re: United States v. Dan Zhong and Landong Wang
Criminal Docket No. 16-614 (DLI)

Dear Counsel:

In light of the mischaracterizations in the defendant's December 14, 2017 reply brief concerning the government's production of recordings of the defendant's jail calls, the government writes to clarify that the Court's March 16, 2017 protective order authorized the delayed production of these materials. The protective order authorized the government to delay two classes of discovery until no later than 120 days before trial; one of these classes of discovery was the defendant's jail calls. The government will provide court-certified transcripts when they are available of any calls that it intends to use at trial.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Very truly yours,

BRIDGET M. ROHDE
Acting United States Attorney

By: /s/ Alexander A. Solomon
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cc: Clerk of the Court (DLI) (by ECF)